UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 2:12-md-02323-AB

MDL No. 2323

Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties, LLC, successor-in-interest to NFL Properties, Inc.,

Defendants.

THIS DOCUMENT RELATES TO:

ALL ACTIONS

Civ. Action No.: 14-cv-00029-AB

STIPULATION AND PROPERT ORDER

This Stipulation and Agreement, dated August [7], 2017, is made and entered into by and among the National Football League and NFL Properties LLC (the "NFL Parties"), and Class Counsel (collectively, the "Parties").

WHEREAS, on April 22, 2015, this Court issued a Memorandum (ECF No. 6509) and Final Order and Judgment (ECF No. 6510), and on May 8, 2015, an amended Final Order and Judgment (ECF No. 6534), approving the Settlement Agreement in its entirety;

¹ Unless otherwise noted, the terms used in this Order that are defined in the Settlement Agreement have the same meanings in this Order as in the Settlement Agreement.

WHEREAS, on May 4, 2015, Claims Administrator BrownGreer PLC, in accordance with the Final Order and Judgment and the Settlement Agreement, filed the list of Opt Outs who timely submitted proper requests to opt out in compliance with Section 14.2(a) of the Settlement Agreement, including Retired NFL Football Players Robert Brooks, IV, Charles Commiskey, Calvin Hill and Jerome McDougle (ECF No. 6533);

WHEREAS, Robert Brooks, IV, Charles Commiskey, Calvin Hill and Jerome McDougle have since submitted written requests seeking to revoke their Opt Out requests (see Exhibit 1 (Declaration of Orran L. Brown, Sr.));

WHEREAS, the Parties have agreed to accept the revocation requests submitted by Robert Brooks, IV, Charles Commiskey, Calvin Hill and Jerome McDougle, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program;

AND NOW, this [71/h] day of August, 2017, it is hereby stipulated and agreed by the Parties that the revocation requests submitted by Robert Brooks, IV, Charles Commiskey, Calvin Hill and Jerome McDougle are accepted, subject to Court approval, because they submitted the requests before the deadline to register for the Class Action Settlement program.

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It is so STIPULATED AND AGRE	ED,					
Ву:	By: Brad S. Karp DB					
Date:August 7, 2017	By: Brad S. Kays DB Date: August 7, 2017					
Christopher Seeger SEEGER WEISS LLP 77 Water Street New York, NY 10005 Phone: (212) 584-0700 cseeger@seegerweiss.com	Brad S. Karp PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP 1285 Avenue of the Americas New York, NY 10019-6064 Phone: (212) 373-3000 bkarp@paulweiss.com					
Class Counsel	Counsel for the NFL Parties					
It is so ORDERED, based on the above Stipulation and the accompanying						
Declaration of Orran L. Brown, Sr., that the revocation requests submitted by Robert Brooks, IV, Charles Commiskey, Calvin Hill and Jerome McDougle are approved and						
the Claims Administrator is DIRECTED to post a revised list of Opt Outs forthwith						
excluding Robert Brooks, IV, Charles Commiskey, Calvin Hill and Jerome McDougle.						
For ANITAB. BRODY, J. NITZA I QUI NONES Aleyandro						

Copies MAILED on _____ to:

Copies VIA ECF on _____ to:

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE	: No. 2:12-md-02323-A
PLAYERS' CONCUSSION INJURY LITIGATION	: MDL No. 232
	: : Hon. Anita B. Brod
THIS DOCUMENT RELATES TO:	:
	:
ALL ACTIONS	_ :

DECLARATION OF ORRAN L. BROWN, SR.

I, ORRAN L. BROWN, SR., hereby declare and state as follows:

- My name is Orran L. Brown, Sr. I am the Chairman and a founding partner of BrownGreer PLC, located at 250 Rocketts Way, Richmond, Virginia 23231. BrownGreer PLC is the Claims Administrator under the Class Action Settlement Agreement in this action.
- 2. I am over the age of 21. The matters set forth in this Declaration are based upon my personal knowledge and information.
- 3. I submit this Declaration to describe four Opt Out revocation requests we recently received.
- 4. In its April 22, 2015 Final Approval Order and Judgment, the Court directed the Claims Administrator to make public a list of Opt Outs as of that date. We posted on the official Settlement website a list of the Opt Outs that were timely and included all the elements required for a valid Opt Out under Section 14.2(a) of the Settlement Agreement (175 names at the time) and a list of the Opt Outs that were untimely and/or were missing one or more of Section 14.2(a)'s required elements (33 names at the time).
- 5. Section 14.2(c) of the Settlement Agreement provides that a Class Member who had Opted Out but wished to revoke that Opt Out could submit a written request to do

so "[p]rior to the Final Approval Date." At various times after the April 22, 2015 Final Approval Date, 78 people who had Opted Out submitted requests to revoke their Opt Outs. The Parties to the Settlement Agreement agreed to accept those revocation requests, subject to Court approval, and reported the requests to the Court. By Orders of July 15, 2015 (Document 6642), December 22, 2015 (Document 6713), January 26, 2016 (Document 6739), September 15, 2016 (Document 6907), October 25, 2016 (Document 6924), November 8, 2016 (Document 6937), December 21, 2016 (Document 7033), January 18, 2017 (Document 7084), January 20, 2017 (Document 7097), February 6, 2017 (Document 7119), March 9, 2017 (Document 7264), March 20, 2017 (Document 7297), March 28, 2017 (Document 7374), April 11, 2017 (Document 7471), April 13, 2017 (Document 7478), April 24, 2017 (Document 7547), May 2, 2017 (Document 7594), May 18, 2017 (Document 7674), May 25, 2017 (Documents 7763 and 7764), June 26, 2017 (Document 7848), July 17, 2017 (Document 8023), July 18, 2017 (Document 8033), July 19, 2017 (Document 8038), July 25, 2017 (Document 8076), July 27, 2017 (Document 8159), July 28, 2017 (Document 8191), August 1, 2017 (Document 8199), August 3, 2017 (Document 8208), August 4, 2017 (Document 8218), and August 7, 2017 (Document 8224) the Court approved 76 of the 78 revocations. The recent revocation requests of Sean Berton and Robert Royal, Jr. are pending before the Court (Document 8215). Each time the Court approved a revocation, we no longer counted that person as an Opt Out and posted on the Settlement website a revised list of Timely Opt Out Requests Containing All Information Required by Section 14.2(a) or Otherwise Approved by the Court (the "Timely Opt Out List") to reflect the results of the Orders. That Timely Opt Out List now contains 105 names, including six persons whose Opt

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Outs the Court directed be added to that list in its Orders of September 8, 2016 (Document 6902) and March 6, 2017 (Document 7244).

- 6. We recently received new revocation requests from four persons on the Timely

 Opt Out List:
 - (a) Robert Brooks, IV: Attachment 1 to this Declaration.
 - (b) Charles Commiskey: Attachment 2.
 - (c) Calvin Hill: Attachment 3.
 - (d) Jerome McDougle: Attachment 4.

We removed personal information from these attachments. The Parties to the Settlement Agreement agreed to accept both revocation requests, subject to Court approval. If the Court grants its approval, we no longer will count these four as Opt Outs and, upon direction of the Court, we will post a revised Timely Opt Out List on the Settlement website.

I, Orran L. Brown, Sr., declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct. Executed on this 7th day of August, 2017.

Orran L. Brown, Sr.

IN RE-NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 2:12-md-02:323 (E.D. Ph.)

REQUEST TO REVOKE OPT OUT FROM SETTLEMENT CLASS				
A person who Opted Out of the NFL Concussion Settlement may request to revoke that Opt Out by completing this form and sending it to the Claims Administrator. The Claims Administrator will present the request to the Parties to the Settlement Agreement for their consideration. If Co-Lead Class Counsel and the NFL Parties both consent, they will submit it to the Court for approval. Complete all sections of this form. If your revocation is approved, you cannot later Opt Out again.				
I. PERSON SEEKING TO REVOKE OPT OUT				
Name	ROBERT	M.L	BRO	DKS.IV
Mailing Address	Address 2		State,	210
Telephone Number				
Date of Birth	1 1/1 1/1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1			
	II. STATEMENT OF	INTENT AN	ID SIGNATU	ine
I wish to revoke my Opt Out from the Settlement Class and instead be included in the Settlement Class.				
Signature	Robert By	644	Date	108 1101411210117
III. HOW TO SUBMIT THIS FORM				
By Email:		ClaimsAdministrator@NFLConcussionSettlement.com		
By Mail:		NFL Concussion Settlement Claims Administrator P.O. Box 25369 Richmond, VA 23260		
By Online Portal:		Go to your secure online portal with the Claims Administrator and upload this signed PDF.		

ATTACHMENT 1

www.NF.ConcussionSettlement.com



CONCUSSION SETTLEMENT

IN RE-NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIRATION No. 2:32-mid-02923 (E.D.-Ph.)

REQUEST TO REVOKE OPT OUT FROM SETTLEMENT CLASS					
A person who Opted Out of the NFL Concussion Settlement may request to revoke that Opt Out by completing this form and sending it to the Claims Administrator. The Claims Administrator will present the request to the Parties to the Settlement Agreement for their consideration. If Co-Lead Class Counsel and the NFL Parties both consent, they will submit it to the Court for approval. Complete all sections of this form. If your revocation is approved, you cannot later Opt Out again.					
1. Person Seeking to Revoke OPT Out					
Name	Charles	^{NL} E	Commi	skeý	
Mailing Address	Address t Address z City		Serio	126	
Telephone Number			-	1-1 1 1 1	
Date of Birth	(Modifinos), Assis				
Settlement Class Member Type	I am a Retired NFL Football Player. I am a Representative Claimant. I have a legal right to act on behalf of a Retired NFL Football Player. I am a Derivative Claimant. I have certain legal rights because of my relationship with a Retired NFL Football Player.				
	II. STATEMENT (OF INTENT	AND SIGNATU	RE	
I wish to revoke my Opt Out from the Settlement Class and instead be included in the Settlement Class.					
Signature Date 10 8 1/10 7 1/1 2 0 1 1 1 7 1 (Marchin Dayrroan)					
(III. How to Submit this Form					
By Email:	ClaimsAdministrator@NFLConcussionSettlement.com				
By Mail:			NFL Concussion Settlement Claims Administrator P.O. Box 25369 Richmond, VA 23260		
By Online Portal:				nline portal with the Claims pload this signed PDF.	

ATTACHMENT 2

www.NFLConcussionSettlement.com





IN REI NATIONAL FOOTBALL LEAGUE FLAYERS' CONCUSSION INJURY LITIGATION No. 2:12-ma 02323 (E.D. Pa.)

REQUEST TO REVOKE OPT OUT FROM SETTLEMENT CLASS				
A person who Opted Out of the NFL Concussion Settlement may request to revoke that Opt Out by completing this form and sending it to the Claims Administrator. The Claims Administrator will present the request to the Parties to the Settlement Agreement for their consideration. If Co-Lead Class Counsel and the NFL Parties both consent, they will submit it to the Court for approval. Complete all sections of this form. If your revocation is approved, you cannot later Opt Out again.				
I. PERSON SEEKING TO REVOKE OPT OUT				
Name	Calvin	K.L	Hill	
Mailing Address	Administ 2	-	State.	Zp.
Telephone Number				
Date of Birth	[Mananajapyear]			
Settlement Class Member Type	I am a Retired NFL Football Player. I am a Representative Claimant. I have a legal right to act on behalf of a Retired NFL Football Player. I am a Derivative Claimant. I have certain legal rights because of my relationship with a Retired NFL Football Player.			
	II. STATEMENT OF	INTENT A	ND SIGNATU	IRE
I wish to revoke my Opt Out from the Settlement Class and instead be included in the Settlement Class.				
Signature	acus As Date 1818/10/71/21		1018410174121 0 1171	
III. HOW TO SUBMIT THIS FORM				
By Email:	•	ClaimsAdministrator@NFLConcussionSettlement.com		
By Mail:		NFL Concussion Settlement Claims Administrator P.O. Box 25369 Richmond, VA 23260		
By Online Portal:		Go to your secure online portal with the Claims Administrator and upload this signed PDF.		

ATTACHMENT 3

vovw.NFl.ConcussionSettlement.com

VFL CONCUSSION SETTLEMENT IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS: CONCUSSION INJUHY CHIGATION No. 2: 12-mid-02323 (E.D. Pa.)

REQUEST TO REVOKE OPT OUT FROM SETTLEMENT CLASS					
A person who Opted Out of the NFL Concussion Settlement may request to revoke that Opt Out by completing this form and sending it to the Claims Administrator. The Claims Administrator will present the request to the Parties to the Settlement Agreement for their consideration. If Co-Lead Class Counsel and the NFL Parties both consent, they will submit it to the Court for approval. Complete all sections of this form. If your revocation is approved, you cannot later Opt Out again.					
I. PERSON SEEKING TO REVOKE OPT OUT					
Name	Jerome	McDougle, Jr			
Malling Address	Address 7	acenne (1990)		Market and the second s	
We will be a second of the sec	City		State	4	
Telephone Number					
Date of Birth					
II. STATEMENT OF INTENT AND SIGNATURE					
I wish to revoke my Opt Out from the Settlement Class and instead be included in the Settlement Class.					
Signature	DM		Date	[0 7 / 1 7 / 2 0 1 7 (Manis/Day/Year)	
III. HOW TO SUBMIT THIS FORM					
By Email:		ClaimsAdministrator@NFLConcussionSettlement.com			
By Mail:		NFL Concussion Settlement Claims Administrator P.O. Box 25369 Richmond, VA 23260			
By Online Portal:		Go to your secure online portal with the Claims Administrator and upload this signed PDF.			

ATTACHMENT 4

www.NFLConcussionSettlement.com

CERTIFICATE OF SERVICE

It is hereby certified that a true copy of the foregoing document

was served electronically via the Court's electronic filing system on the 7th

day of August, 2017, upon all counsel of record.

Dated: August 7, 2017

/s/ Brad S. Karp

Brad S. Karp